

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

CONOPCO, INC. D/B/A UNILEVER,

Plaintiff,

v.

WELLS ENTERPRISES, INC.,

Defendant.

Case No.: 1:14-cv-02223-NRB-RLE

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DATE FILED: 06/09/2015**

WELLS ENTERPRISES, INC.,

Counterclaim Plaintiff,

v.

CONOPCO, INC. D/B/A UNILEVER,

Counterclaim Defendant.

STIPULATION TO EXTEND TIME

Plaintiff-Counterclaim Defendant Conopco, Inc. d/b/a Unilever ("Unilever"), and Defendant-Counterclaim Plaintiff Wells Enterprises, Inc. ("Defendant") (hereinafter collectively, the "Parties"), stipulate and agree that all deadlines set forth in the Court's January 22, 2015 order (the "Order") shall be extended by 45 days, as follows:

Event	Current Deadline	Proposed Deadline
Initial expert reports due	June 5, 2015	July 20, 2015
Rebuttal expert reports due	July 10, 2015	August 24, 2015
Close of all fact discovery	August 14, 2015	September 28, 2015

Event	Current Deadline	Proposed Deadline
Close of all expert discovery	August 31, 2015	October 15, 2015
Last day to file case dispositive motions	September 14, 2015	October 29, 2015

This stipulation is the parties' first request to extend the deadlines set forth in the Court's January 22, 2015 order. The requested extension is not being sought for the purpose of delay. The parties are currently engaged in settlement discussions. The parties have drafted and exchanged draft versions of a proposed settlement agreement and hope to amicably resolve this matter. Accordingly, the parties, by and through their attorneys of record, hereby stipulate and request that the aforementioned dates set forth in the Court's January 22, 2015 order be continued as set forth above. Accordingly, the Parties submit the enclosed proposed Revised Scheduling Order.

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*Attorneys for Defendant/Counterclaim Plaintiff
 Wells Enterprises, Inc.*

SO ORDERED:

Laoni Lee Turner
U.S.D.J.

6/8/15